

August 10, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: Subscriber Notification and Acknowledgement Status and Compliance Report of  
I2 Telecom International, Inc., WC Docket No. 05-196

Dear Ms. Dortch:

I2 Telecom International, Inc. ("I2"), through its undersigned counsel and in compliance with the Commission's *VoIP E911 Order* ("Order") and the Public Notice issued by the Enforcement Bureau on July 26, 2005 ("Public Notice"), submits this report to advise the Commission of the status of I2's efforts to comply with Commission Rule 9.5(e).

As required by the Public Notice, I2 responds to the following questions set out in the Public Notice:

**1) A detailed description of all actions the provider has taken to specifically advise every subscriber, prominently and in plain language, of the circumstances under which E911 service may not be available through the interconnected VoIP service and/or may be in some way limited by comparison to traditional E911 service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers.**

Currently, I2 notifies customers of their obligation to provide affirmative acknowledgement via U.S. Mail, E-Mail, telephone calls, I2's Website and the customers' "MyAccount" webpage. New Customers are required to affirmatively acknowledge current I2 911 limitations and restrictions prior to activation of their account. I2 has taken the following steps to provide the notifications to all of the Company's existing customers, required under Rule 9.5(e)(1):

- I2 distributed its customer notification regarding 911 and E911 service limitations to all U.S. based customers on July 15, 2005 via e-mail. Subsequent to this notice, I2 has

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and will continue to notify subscribers that have not provided the required acknowledgment. I2 notified customers that had not returned the affirmative acknowledgment again on July 18, 2005 via e-mail; on July 20, 2005 via U.S. Mail; on July 21, 2005 via e-mail; July 25 2005 via e-mail; July 27-2005 via U.S. Mail; July 29, 2005 via e-mail; August 2, 2005 via e-mail; August 4, 2005 via e-mail and August 8, 2005 via e-mail. In addition, I2 is regularly calling customers to tell them that they need to visit the I2 website to review the dialing notice and send in the forms (either via mail or via fax) acknowledge that they have received and understand the notice.

**2) A quantification of how many of the provider's subscribers, on a percentage basis, have submitted an affirmative acknowledgement, as of the date of the report, and an estimation of the percentage of subscribers from whom they do not expect to receive an acknowledgement by August 29, 2005.**

- As of August 8, 2005, I2 has obtained affirmative acknowledgement from approximately 67% of its U.S. subscriber base. I2 cannot predict with precision what its final response rate will be, but estimates that approximately 15% of its customers will still not have provided affirmative acknowledgement by August 29, 2005.

**3) A detailed description of whether and how the provider has distributed to all subscribers warning stickers or other appropriate labels warning subscribers if E911 service may be limited or not available and instructing the subscriber to place them on and/or near the customer premises equipment used in connection with the interconnected VoIP service. This information should include, but is not limited to, relevant dates and methods of contact with subscribers (i.e. e-mail, U.S. mail).**

- I2 has distributed warning labels to all of its existing subscribers. Those labels, along with appropriate instructions that advise the subscriber to place the labels on or near the customer premises equipment, were distributed to subscribers on or about July 27, 2005 though the U.S. Mail. I2 also began providing warning labels to new subscribers who signed up for service beginning on July 1, 2005, to ensure that those new subscribers would receive the required labels on a timely basis. On a going forward basis, I2 will provide stickers in each package of equipment (i.e. the ATA) along with a letter instructing customers to place the stickers on or near the customer premise equipment. Customers that subscribe to I2 VoIP service that do not require delivery of equipment will receive their stickers and letter via U.S. Mail. The distribution of stickers to customers in both instances is tracked within I2's internal systems.

**4) A quantification of how many subscribers, on a percentage basis, to whom the provider did not send the advisory described in [Question 1] and/or to whom the provider did not send warning stickers or other appropriate label as identified in [Question 3].**

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- I2 has distributed advisories and warning labels/stickers to 100% of its US subscribers.

**5) A detailed description of any and all actions the provider plans on taking towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory, including, but not limited to, disconnecting the subscriber's VoIP service with the Company no later than August 30, 2005.**

- I2 is continuing its campaign to contact and obtain affirmative acknowledgment from all of its subscribers. I2 continues to send out notices via US Mail, E-Mail, and will also telephone subscribers who have not yet submitted an affirmative acknowledgment by August 29, 2005.
- As detailed in response to Question 2, I2 expects that despite its diligent efforts, the Company will not be able to obtain affirmative acknowledgement from some subscribers by August 29, 2005. For those customers that do not provide affirmative acknowledgement, on August 30, 2005, I2 currently plans to disconnect such customers from their service until they provide the required affirmative acknowledgement. Upon disconnection it is anticipated that customers will call into I2's Customer Service Department and request service repair. At this time it is I2's intention to instruct customers that their service will be reinstated upon affirmative acknowledgement via the I2 website or either U.S. Mail or fax receipt of the signed and dated letter that I2 has provided.

**6) A detailed description of how the provider is currently maintaining any acknowledgements received from its subscribers.**

- I2 is tracking acknowledgements made on the website with a date and time stamp using standard coding practices and database software. U.S. mail and fax returns are being tracked in an Excel spreadsheet along with an update in the website services tables. Paper copies of all letters and fax acknowledgments are being inventoried and filed in storage for future reference.

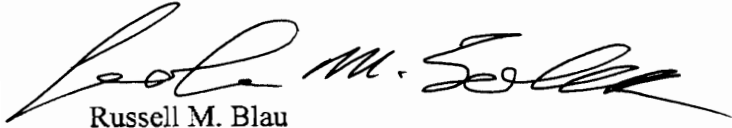
**7) The name, title, address, phone number, and e-mail address of the person(s) responsible for the Company's compliance efforts with the VoIP E911 Order.**

James R. Rose  
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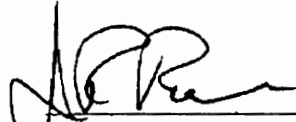
Respectfully submitted,



Russell M. Blau  
Joshua M. Bobeck

Counsel for I2 Telecom International, Inc.

I, James R. Rose, state that I am Chief Technology Officer of I2 Telecom International, Inc.; that I am authorized to submit this report on behalf of I2 Communications, LLC; that the foregoing filing was prepared under my direction and supervision; and I declare under penalty of perjury that this report is true and correct to the best of my knowledge, information, and belief.



Name: James R. Rose  
Title: Chief Technology Officer  
I2 Telecom International, Inc.

A copy of this filing has been provided to each of the following:

Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,

Kathy Berthot, Deputy Chief, Spectrum Enforcement Division, Enforcement Bureau,

Janice Myles, Competition Policy Division, Wireline Competition Bureau, and

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